

REMARKS

This Amendment is being filed in response to the Final Office Action mailed on December 29, 2009. By means of the present amendment, claims 1 and 33 have been amended for better clarity. Accordingly no new issues have been introduced that require a new search, and thus entry of the present amendment is respectfully requested.

Claims 1-3, 4-15 and 33 are pending in this application, where claim 1 is independent.

In the Final Office Action, claim 33 is rejected under 35 U.S.C. §112, second paragraph. Applicant respectfully traverses this rejection. However, in the interest of advancing prosecution, claim 33 has been amended for better clarity. Accordingly, withdrawal of this rejection is respectfully requested.

In the Final Office Action, claims 1-3 and 5-15 are rejected under 35 U.S.C. §103(a) over WO 01/37309 (Partlo) in view of U.S. Patent No. 4,597,665 (Galbraith). Further, claim 33 is rejected under 35 U.S.C. §103(a) over Partlo in view of Galbraith and U.S. Patent No. 6,444,037 (Frankel). It is respectfully submitted that claims 1-3, 4-15 and 33 are patentable over Partlo, Galbraith and

Frankel for at least the following reasons.

Partlo is directed to a plasma focus light source that includes a conical nested debris collector 5. The debris collector 5 collects debris resulting from a plasma pinch, as recited on page 11, line 10. As clearly shown in FIG 9, the conical nested debris collector 5 is located between a dense plasma focus (DPF) radiation source and a collector director 4 that receives the radiation from the DPF. The debris collector 5 prevents debris from reaching the collector director 4. As correctly noted on page 4, last paragraph of the Final Office Action, Partlo does not disclose or suggest collecting the contaminants at an obstacle located at a second portion of the surface, where the obstacle includes a recess formed in the surface. Galbraith is cited in an attempt to remedy the deficiencies in Partlo.

Galbraith is directed to a dual collector optical flaw detector for detecting defects at a surface 25 such as pin holes and cracks, as recited on column 2, lines 64-65, and column 3, lines 12-14. As recited on column 4, lines 23-24 the Galbraith detector "detects very small holes, compared to the beam diameter."

It is respectfully submitted that Partlo, Galbraith, and combination thereof, do not teach or suggest the present invention

as recited in independent claim 1 which, amongst other patentable elements, recites (illustrative emphasis provided):

providing at least one obstacle located at a second portion of said at least one surface, the second portion being outside the first portion to be cleaned; and
collecting the contaminants at said at least one obstacle, wherein said at least one obstacle includes at least one recess formed in said at least one surface.

There is simply no teaching or suggestion in Partlo and Galbraith, alone or in combination, of providing an obstacle located at a second portion outside the first portion to be cleaned, and collecting contaminants at the obstacle that includes a recess in the second portion outside the first portion to be cleaned, as recited in independent claim 1.

Further, there is no motivation to combine the Partlo debris collector with the Galbraith detector. Partlo and Galbraith are not even related and disclosed unrelated systems, where Partlo is concerned with debris collection and the Galbraith is concerned with detecting surface cracks or holes.

Even assuming, arguendo, that the combination of Partlo and Galbraith is proper, such a combination, at best, discloses a detector that detects very small holes or cracks in a surface and

includes a conical nested debris collector 5. Galbraith is not even concerned with cleaning, but rather is concerned with detection of defects such as crack or holes. Further, such cracks or holes are not provided in any particular location, and Galbraith is completely silent about providing any obstacles outside a portion of the surface to be cleaned. Frankel is cited to allegedly show other features and does not remedy the deficiencies in Partlo and Galbraith.

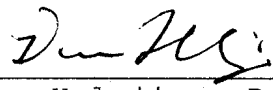
Based on the foregoing, it is respectfully submitted that independent claim 1 is allowable, and allowance thereof is respectfully requested. In addition, it is respectfully submitted that claims 2-3, 4-15 and 33 should also be allowed at least based on their dependence from independent claim 1, as well as their individually patentable elements. Accordingly, separate consideration of each of the dependent claims is respectfully requested.

In addition, Applicant denies any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of argument not addressed would appear to be moot in view of the presented remarks. However, the Applicant reserves the right to

submit further arguments in support of the above stated position, should that become necessary. No arguments are waived and none of the Examiner's statements are conceded.

In view of the above, it is respectfully submitted that the present application is in condition for allowance, and a Notice of Allowance is earnestly solicited.

Respectfully submitted,

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